REMARKS

In the Office Action mailed January 29, 2007, the Office Action rejected claims 31-33 under 35 U.S.C. § 101. The Office Action also rejected claims 1-33 under 35 U.S.C. § 102. Claim 1, 7, 16, 20, 23, 26 and 29-33 have been amended. Claims 8 and 24 have been canceled.

Applicants respectfully respond to this Office Action.

I.   Rejection of Claims 31-33 Under 35 U.S.C. § 101

The Office Action rejected claims 31-33 under 35 U.S.C. § 101 as being directed to non-statutory subject matter. Claims 31-33 have been amended as suggested by the Office Action. As such, Applicants respectfully request that the rejection of claims 31-33 be withdrawn.

II.   Rejection of Claims 1-33 Under 35 U.S.C. § 102(e)

The Office Action rejected claims 1-33 under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,876,640 to Bertrand et al. (hereinafter, "Bertrand"). Claims 8 and 24 have been canceled. The rejection of the remaining claims is respectfully traversed.

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." MPEP § 2131 (citing Verdegaal Bros. v. Union Oil Co. of California, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987)). "The identical invention must be shown in as complete detail as is contained in the … claim." Id. (citing Richardson v. Suzuki Motor Co., 9 USPQ2d 1913, 1920 (Fed. Cir. 1989)). In addition, "the reference must be enabling and describe the applicant's claimed invention sufficiently to have placed it in possession of a person of ordinary skill in the field of the invention." In re Paulsen, 31 USPQ2d 1671, 1673 (Fed. Cir. 1994).

Applicants respectfully submit that the claims at issue are patentably distinct from Bertrand. Bertrand does not disclose all of the limitations in these claims.

Claim 1 recites "a transmitter for sending a registration in response to the received connection identifier when the received connection identifier is not contained in the connection table." Bertrand does not disclose this claim element. The Office Action asserts that an International Mobile Station Identifier (IMSI) discloses a connection identifier. See Office Action, page 3. However, Bertrand does not disclose "sending a registration in response to the

received connection identifier when the received connection identifier is not contained in the connection table."

Rather, Bertrand states:

> If the RN 108(2) is unable to resume the PPP session of the mobile station 102(1) with the same PDSN 120(1), but is able to contact, for example, a new PDSN 120(2), the PDSN 120(2) will inquire of the PPP register 126(1) as to whether the PPP register 126(1) has stored the IMSI of the mobile station 102(1). If the PPP register 126(1) has stored the IMSI of the mobile station 102(1), the PPP register 126(1) will return the previously-stored PPP context for the present PPP session of the mobile station 102(1) to the PDSN 120(2). Because PPP contexts for mobile stations engaged in pending PPP sessions are stored by the PPP register 126(1) and are indexed by IMSI, when the IMSI of a particular mobile station is being stored by the PPP register, this means that the particular mobile station is engaged in a pending PPP session and that its PPP context can be used to resume the PPP session. Following receipt of the PPP context by the PDSN 120(2), the PPP session can be resumed without any further PPP negotiation or creation of a new PPP context.

Bertrand, Col. 7, lines 1-19.

It appears that the Office Action is asserting that "the PPP register . . . return[ing] the previously-stored PPP context" discloses "sending a registration." Applicants respectfully disagree. Bertrand discloses that the previously-stored PPP context is returned "if the PPP register . . . has stored the IMSI of the mobile station." In contrast, Claim 1 recites "sending a registration in response to the received connection identifier when the received connection identifier is not contained in the connection table." Returning the previously-stored PPP context does not disclose "sending a registration" because the previously-stored PPP context is only returned "if the PPP register . . . has stored the IMSI of the mobile station."

Bertrand also states:

> In response to the IMSI Unavailable message 304, the PDSN 120(1) executes the PPP negotiation 206, which represents a complete negotiation of the PPP context for this session for the mobile station 202 . . . Following the PPP negotiation 206, the PDSN 120(1) sends an Add-Entry message 306 to the PPP register 126(1), which message directs the PPP register 126(1) to add to its database the PPP context for the mobile station 102(1) for the present PPP session, the PPP context being linked to the IMSI of the mobile station 102(1).

Bertrand, Col. 8, lines 12-23.

Regarding the above cited passage of Bertrand, the Office Action asserts "Bertrand further discussed that a new PPP context is created if IMSI of the mobile station is not stored in the PPP register." Office Action, page 4. Again, it appears that the Office Action is asserting that "a new PPP context is created" discloses "sending a registration." However, Bertrand does not disclose "sending a registration in response to the received connection identifier when the received connection identifier is not contained in the connection table." Bertrand discloses that "a complete negotiation of the PPP context" is done "[i]n response to the IMSI Unavailable message." Bertrand, col. 8, lines 12-13. There is no disclosure in the passages cited by the Office Action of Bertrand of "sending a registration in response to the received connection identifier when the received connection identifier is not contained in the connection table." In fact, the "sending a registration" element asserted by the Office Action to be disclosed by Bertrand (i.e. creating a new PPP context) is only performed when the IMSI is unavailable and thus, not received.

In view of the foregoing, Applicants respectfully submit that claim 1 is patentably distinct from Bertrand. Accordingly, Applicants respectfully submit that the rejection of claim 1 be withdrawn.

The Office Action rejected claims 2-6 under 35 U.S.C. § 102(e) based on Bertrand. This rejection is respectfully traversed. It is well settled that if an independent claim is patentable over the cited art, then all claims depending from the independent claim are similarly patentable. M.P.E.P. § 2143.03 ("If an independent claim is nonobvious under 35 U.S.C. § 103, then any claim depending therefrom is nonobvious"). In this case claims 2-6 depend either directly or indirectly from claim 1. As noted above, claim 1 is patentable and nonobvious over Bertrand. Accordingly, as the independent claim is patentable over this reference, dependent claims 2-6 (which depend from independent claim 1) are similarly allowable. Favorable consideration and withdrawal of this rejection is respectfully requested.

Claim 7 has been amended to recite "a buffer for receiving data from the network that is designated for delivery to a wireless communication device, storing the received data until the wireless communication device is located on one of the connections in the connection set and transmitting the stored data on the selected connection to the wireless communication device." Support for this amendment may be found in Applicants' specification, page 9, paragraph 1035 and canceled claim 8. Bertrand does not disclose this claim element.

Rather, Bertrand states:

> In response to the IMSI Unavailable message 304, the PDSN 120(1) executes the PPP negotiation 206, which represents a complete negotiation of the PPP context for this session for the mobile station 202 . . . Following the PPP negotiation 206, the PDSN 120(1) sends an Add-Entry message 306 to the PPP register 126(1), which message directs the PPP register 126(1) to add to its database the PPP context for the mobile station 102(1) for the present PPP session, the PPP context being linked to the IMSI of the mobile station 102(1) . . . In response to the Add-Entry message 306, the PPP register 126(1) adds the PPP context to its database and returns an Add-Entry Ack message 308 to the PDSN 120(1), indicating that it has received the Add-Entry message 306 from the PDSN 120(1) and has stored the PPP context for the mobile station 102(1) for the present session.

Bertrand, col. 8, lines 12-31.

The Office Action asserts that "a buffer" is disclosed as a database in Bertrand. See Office Action, page 6. However, Bertrand does not disclose the database "storing the received data until the wireless communication device is located on one of the connections in the connection set." As previously stated, Bertrand discloses that "[f]ollowing the PPP negotiation . . . the PDSN . . . sends an Add-Entry message . . . to the PPP register . . . which message directs the PPP register . . . to add to its database the PPP context for the mobile station." Bertrand, col. 8, lines 17-21. Adding the PPP context to the database does not disclose "storing the received data until the wireless communication device is located." Bertrand merely discloses that the PPP context is added to the database following the PPP negotiation. PPP negotiation does not disclose locating the wireless communication device. Instead, Bertrand discloses that PPP negotiation produces "negotiated values of the PPP parameters." Bertrand, col. 3, lines 7-8.

In view of the foregoing, Applicants respectfully submit that claim 7 is patentably distinct from Bertrand. Accordingly, Applicants respectfully request that the rejection of claim 7 be withdrawn.

Claims 9-15 depend either directly or indirectly from claim 7. Accordingly, Applicants respectfully submit that the rejection of claims 9-15 be withdrawn for the same reasons as those presented in connection with claim 7 because Bertrand does not disclose all of the claim elements in claim 7.

Claim 16 has been amended to recite "wherein the received transmission includes the registration in response to the connection identifier when the connection identifier is not

included in the connection table." Support for this amendment may be found in Applicants' specification, for example, page 5, paragraph 1024. Bertrand does not disclose this claim element. The Office Action asserts that an International Mobile Station Identifier (IMSI) discloses a connection identifier. See Office Action, page 3. However, Bertrand does not disclose "wherein the received transmission includes the registration in response to the connection identifier when the connection identifier is not included in the connection table."

Rather, Bertrand states:

> If the RN 108(2) is unable to resume the PPP session of the mobile station 102(1) with the same PDSN 120(1), but is able to contact, for example, a new PDSN 120(2), the PDSN 120(2) will inquire of the PPP register 126(1) as to whether the PPP register 126(1) has stored the IMSI of the mobile station 102(1). If the PPP register 126(1) has stored the IMSI of the mobile station 102(1), the PPP register 126(1) will return the previously-stored PPP context for the present PPP session of the mobile station 102(1) to the PDSN 120(2). Because PPP contexts for mobile stations engaged in pending PPP sessions are stored by the PPP register 126(1) and are indexed by IMSI, when the IMSI of a particular mobile station is being stored by the PPP register, this means that the particular mobile station is engaged in a pending PPP session and that its PPP context can be used to resume the PPP session. Following receipt of the PPP context by the PDSN 120(2), the PPP session can be resumed without any further PPP negotiation or creation of a new PPP context.

Bertrand, Col. 7, lines 1-19.

It appears that the Office Action is asserting that "the PPP register . . . return[ing] the previously-stored PPP context" discloses "a registration." Applicants respectfully disagree. Bertrand discloses that the previously-stored PPP context is returned "if the PPP register . . . has stored the IMSI of the mobile station." In contrast, Claim 16 recites "wherein the received transmission includes the registration in response to the connection identifier when the connection identifier is not included in the connection table." Returning the previously-stored PPP context does not disclose "a registration" because the previously-stored PPP context is only returned "if the PPP register . . . has stored the IMSI of the mobile station."

Bertrand also states:

> In response to the IMSI Unavailable message 304, the PDSN 120(1) executes the PPP negotiation 206, which represents a complete negotiation of the PPP context for this session for the mobile station 202 . . . Following the PPP negotiation 206, the PDSN 120(1) sends an Add-Entry message 306 to the PPP register 126(1), which message directs the PPP

> register 126(1) to add to its database the PPP context for the mobile
> station 102(1) for the present PPP session, the PPP context being linked to
> the IMSI of the mobile station 102(1).

Bertrand, Col. 8, lines 12-23.

Regarding the above cited passage of Bertrand, the Office Action asserts "Bertrand further discussed that a new PPP context is created if IMSI of the mobile station is not stored in the PPP register." Office Action, page 4. Again, it appears that the Office Action is asserting that "a new PPP context is created" discloses "a registration." However, Bertrand does not disclose "wherein the received transmission includes the registration in response to the connection identifier when the connection identifier is not included in the connection table." Bertrand discloses that "a complete negotiation of the PPP context" is done "[i]n response to the IMSI Unavailable message." Bertrand, col. 8, lines 12-13. There is no disclosure in the passages cited by the Office Action of Bertrand of "wherein the received transmission includes the registration in response to the connection identifier when the connection identifier is not included in the connection table." In fact, the "registration" element asserted by the Office Action to be disclosed by Bertrand (i.e. creating a new PPP context) is only performed when the IMSI is unavailable and thus, not received.

In view of the foregoing, Applicants respectfully submit that claim 16 is patentably distinct from Bertrand. Accordingly, Applicants respectfully request that the rejection of claim 16 be withdrawn.

Claim 17 depends directly from claim 16. Accordingly, Applicants respectfully request that the rejection of claim 17 be withdrawn for the same reasons as those presented in connection with claim 16 because Bertrand does not disclose all of the claim elements in claim 16.

Claim 18 recites "a wireless communication device for receiving a connection identifier, storing the received connection identifier in a connection table, and transmitting a registration when the received connection is not contained in the connection table." Bertrand does not disclose this claim element.

Instead Bertrand states:

> The PDSN 120(1) will then inquire of the PPP register 126(1) to
> determine whether the PPP register 126(1) has stored a unique identifier,
> such as, for example, an International Mobile Station Identifier (IMSI), for
> the mobile station 102(1). The unique identifiers of the mobile station
> 102(1) allow the system 100 to uniquely identify the mobile station

> 102(1). The unique identifiers of mobile stations are stored by the PPP register 126(1) and are indexed so that a lookup can be performed to determine whether a PPP context for a particular mobile station has been stored. Although IMSIs are used herein as exemplary unique identifiers, any other identifier that uniquely identifies a mobile station can be used by the PPP register 126(1).

Bertrand, Col. 6, lines 10-23

Regarding the above passage of Bertrand, the Office Action asserts that a PPP session discloses "a connection identifier." See Office Action, page 9. However, the above cited passage of Bertrand includes no disclosure whatsoever of a PPP session, let alone a PPP session as a "connection identifier." In contrast, Bertrand discloses that "[a] packet data transfer session between a mobile station and a PDSN is referred to as a PPP session." Bertrand, col. 1, lines 65-67.

The Office Action previously asserted that an International Mobile Station Identifier (IMSI) discloses a connection identifier. See Office Action, page 3. However, Bertrand does not disclose "a wireless communication device for receiving a connection identifier, storing the received connection identifier in a connection table, and transmitting a registration when the received connection is not contained in the connection table."

Rather, Bertrand states:

> If the RN 108(2) is unable to resume the PPP session of the mobile station 102(1) with the same PDSN 120(1), but is able to contact, for example, a new PDSN 120(2), the PDSN 120(2) will inquire of the PPP register 126(1) as to whether the PPP register 126(1) has stored the IMSI of the mobile station 102(1). If the PPP register 126(1) has stored the IMSI of the mobile station 102(1), the PPP register 126(1) will return the previously-stored PPP context for the present PPP session of the mobile station 102(1) to the PDSN 120(2). Because PPP contexts for mobile stations engaged in pending PPP sessions are stored by the PPP register 126(1) and are indexed by IMSI, when the IMSI of a particular mobile station is being stored by the PPP register, this means that the particular mobile station is engaged in a pending PPP session and that its PPP context can be used to resume the PPP session. Following receipt of the PPP context by the PDSN 120(2), the PPP session can be resumed without any further PPP negotiation or creation of a new PPP context.

Bertrand, Col. 7, lines 1-19.

It appears that the Office Action is asserting that "the PPP register . . . return[ing] the previously-stored PPP context" discloses "a registration." Applicants respectfully disagree.

Bertrand discloses that the previously-stored PPP context is returned "if the PPP register . . . has stored the IMSI of the mobile station." In contrast, Claim 18 recites "a wireless communication device for receiving a connection identifier, storing the received connection identifier in a connection table, and transmitting a registration when the received connection is not contained in the connection table." Returning the previously-stored PPP context does not disclose "a registration" because the previously-stored PPP context is only returned "if the PPP register . . . has stored the IMSI of the mobile station."

Bertrand also states:

> In response to the IMSI Unavailable message 304, the PDSN 120(1) executes the PPP negotiation 206, which represents a complete negotiation of the PPP context for this session for the mobile station 202 . . . Following the PPP negotiation 206, the PDSN 120(1) sends an Add-Entry message 306 to the PPP register 126(1), which message directs the PPP register 126(1) to add to its database the PPP context for the mobile station 102(1) for the present PPP session, the PPP context being linked to the IMSI of the mobile station 102(1).

Bertrand, Col. 8, lines 12-23.

Regarding the above cited passage of Bertrand, the Office Action asserts "Bertrand further discussed that a new PPP context is created if IMSI of the mobile station is not stored in the PPP register." Office Action, page 4. Again, it appears that the Office Action is asserting that "a new PPP context is created" discloses "a registration." However, Bertrand does not disclose "a wireless communication device for receiving a connection identifier, storing the received connection identifier in a connection table, and transmitting a registration when the received connection is not contained in the connection table." Bertrand discloses that "a complete negotiation of the PPP context" is done "[i]n response to the IMSI Unavailable message." Bertrand, col. 8, lines 12-13. There is no disclosure in the passages cited by the Office Action of Bertrand of "a wireless communication device for receiving a connection identifier, storing the received connection identifier in a connection table, and transmitting a registration when the received connection is not contained in the connection table." In fact, the "registration" element asserted by the Office Action to be disclosed by Bertrand (i.e. creating a new PPP context) is only performed when the IMSI is unavailable and thus, not received.

In view of the foregoing, Applicants respectfully submit that claim 18 is patentably distinct from Bertrand. Accordingly, Applicants respectfully request that the rejection of claim 18 be withdrawn.

Claim 19 depends directly from claim 18. Accordingly, Applicants respectfully request that the rejection of claim 19 be withdrawn for the same reasons as those presented in connection with claim 18 because Bertrand does not disclose all of the claim elements in claim 18.

Claim 20 recites "registering a connection in response to a received connection not contained in a connection table." Bertrand does not disclose this claim element.

Rather, Bertrand states:

> If the RN 108(2) is unable to resume the PPP session of the mobile station 102(1) with the same PDSN 120(1), but is able to contact, for example, a new PDSN 120(2), the PDSN 120(2) will inquire of the PPP register 126(1) as to whether the PPP register 126(1) has stored the IMSI of the mobile station 102(1). If the PPP register 126(1) has stored the IMSI of the mobile station 102(1), the PPP register 126(1) will return the previously-stored PPP context for the present PPP session of the mobile station 102(1) to the PDSN 120(2). Because PPP contexts for mobile stations engaged in pending PPP sessions are stored by the PPP register 126(1) and are indexed by IMSI, when the IMSI of a particular mobile station is being stored by the PPP register, this means that the particular mobile station is engaged in a pending PPP session and that its PPP context can be used to resume the PPP session. Following receipt of the PPP context by the PDSN 120(2), the PPP session can be resumed without any further PPP negotiation or creation of a new PPP context.

Bertrand, Col. 7, lines 1-19.

It appears that the Office Action is asserting that "the PPP register . . . return[ing] the previously-stored PPP context" discloses "registering a connection." Applicants respectfully disagree. Bertrand discloses that the previously-stored PPP context is returned "if the PPP register . . . has stored the IMSI of the mobile station." In contrast, Claim 20 recites "registering a connection in response to a received connection not contained in a connection table." Returning the previously-stored PPP context does not disclose "registering a connection" because the previously-stored PPP context is only returned "if the PPP register . . . has stored the IMSI of the mobile station" and not "in response to a received connection not contained in a connection table."

Bertrand also states:

> In response to the IMSI Unavailable message 304, the PDSN 120(1)
> executes the PPP negotiation 206, which represents a complete negotiation
> of the PPP context for this session for the mobile station 202 . . .
> Following the PPP negotiation 206, the PDSN 120(1) sends an Add-Entry
> message 306 to the PPP register 126(1), which message directs the PPP
> register 126(1) to add to its database the PPP context for the mobile
> station 102(1) for the present PPP session, the PPP context being linked to
> the IMSI of the mobile station 102(1).

Bertrand, Col. 8, lines 12-23.

Regarding the above cited passage of Bertrand, the Office Action asserts "Bertrand further discussed that a new PPP context is created if IMSI of the mobile station is not stored in the PPP register." Office Action, page 4. Again, it appears that the Office Action is asserting that "a new PPP context is created" discloses "registering a connection." However, Bertrand does not disclose "registering a connection in response to a received connection not contained in a connection table." Bertrand discloses that "a complete negotiation of the PPP context" is done "[i]n response to the IMSI Unavailable message." Bertrand, col. 8, lines 12-13. There is no disclosure in the passages cited by the Office Action of Bertrand of "registering a connection in response to a received connection not contained in a connection table." In fact, the "registering a connection" element asserted by the Office Action to be disclosed by Bertrand (i.e. creating a new PPP context) is only performed when the IMSI is unavailable and thus, not received.

In view of the foregoing, Applicants respectfully submit that claim 20 is patentably distinct from Bertrand. Accordingly, Applicants respectfully request that the rejection of claim 20 be withdrawn.

Claims 21 and 22 directly from claim 20. Accordingly, Applicants respectfully request that the rejection of claims 21 and 22 be withdrawn for the same reasons as those presented in connection with claim 20 because Bertrand does not disclose all of the claim elements in claim 20.

Claim 23 has been amended in a similar manner as claim 7. As such, Applicants submit that claim 23 is patentably distinct from Bertrand. Accordingly, Applicants respectfully request that the rejection of claim 23 be withdrawn.

Claim 25 depends directly from claim 23. Accordingly, Applicants respectfully request that the rejection of claim 25 be withdrawn for the same reasons presented in connection with claim 23 because Bertrand does not disclose all of the claim elements in claim 23.

Claim 26 has been amended in a similar manner as claim 16. As such, Applicants submit that claim 26 is patentably distinct from Bertrand. Accordingly, Applicants respectfully request that the rejection of claim 26 be withdrawn.

Claim 27 depends directly from claim 26. Accordingly, Applicants respectfully request that the rejection of claim 27 be withdrawn for the same reasons as those presented in connection with claim 26 because Bertrand does not disclose all of the claim elements in claim 26.

Claim 28 recites "means for registering a connection in response to a received connection not contained in a connection table." Bertrand does not disclose this claim element.

Bertrand states:

> In response to the IMSI Unavailable message 304, the PDSN 120(1) executes the PPP negotiation 206, which represents a complete negotiation of the PPP context for this session for the mobile station 202 . . . Following the PPP negotiation 206, the PDSN 120(1) sends an Add-Entry message 306 to the PPP register 126(1), which message directs the PPP register 126(1) to add to its database the PPP context for the mobile station 102(1) for the present PPP session, the PPP context being linked to the IMSI of the mobile station 102(1).

Bertrand, Col. 8, lines 12-23.

Regarding the above cited passage of Bertrand, the Office Action asserts "Bertrand further discussed that a new PPP context is created if IMSI of the mobile station is not stored in the PPP register." Office Action, page 4. It appears that the Office Action is asserting that "a new PPP context is created" discloses "registering a connection." However, Bertrand does not disclose "registering a connection in response to a received connection not contained in a connection table." Bertrand discloses that "a complete negotiation of the PPP context" is done "[i]n response to the IMSI Unavailable message." Bertrand, col. 8, lines 12-13. There is no disclosure in the passages cited by the Office Action of Bertrand of "means for registering a connection in response to a received connection not contained in a connection table." In fact, the "registering a connection" element asserted by the Office Action to be disclosed by Bertrand (i.e. creating a new PPP context) is only performed when the IMSI is unavailable and thus, not received.

In view of the foregoing, Applicants respectfully submit that claim 28 is patentably distinct from Bertrand. Accordingly, Applicants respectfully request that the rejection of claim 28 be withdrawn.

Claim 29 has been amended in a similar manner as claims 7 and 23. As such, Applicants submit that claim 29 is patentably distinct from Bertrand. Accordingly, Applicants respectfully request that the rejection of claim 29 be withdrawn.

Claim 30 has been amended in a similar manner as claims 16 and 26. As such, Applicants submit that claim 30 is patentably distinct from Bertrand. Accordingly, Applicants respectfully request that the rejection of claim 30 be withdrawn.

Claim 31 recites "registering a connection in response to a received connection not contained in a connection table." Bertrand does not disclose this claim element.

Bertrand states:

> In response to the IMSI Unavailable message 304, the PDSN 120(1) executes the PPP negotiation 206, which represents a complete negotiation of the PPP context for this session for the mobile station 202 . . . Following the PPP negotiation 206, the PDSN 120(1) sends an Add-Entry message 306 to the PPP register 126(1), which message directs the PPP register 126(1) to add to its database the PPP context for the mobile station 102(1) for the present PPP session, the PPP context being linked to the IMSI of the mobile station 102(1).

Bertrand, Col. 8, lines 12-23.

Regarding the above cited passage of Bertrand, the Office Action asserts "Bertrand further discussed that a new PPP context is created if IMSI of the mobile station is not stored in the PPP register." Office Action, page 4. It appears that the Office Action is asserting that "a new PPP context is created" discloses "registering a connection." However, Bertrand does not disclose "registering a connection in response to a received connection not contained in a connection table." Bertrand discloses that "a complete negotiation of the PPP context" is done "[i]n response to the IMSI Unavailable message." Bertrand, col. 8, lines 12-13. There is no disclosure in the passages cited by the Office Action of Bertrand of "registering a connection in response to a received connection not contained in a connection table." In fact, the "registering a connection" element asserted by the Office Action to be disclosed by Bertrand (i.e. creating a new PPP context) is only performed when the IMSI is unavailable and thus, not received.

In view of the foregoing, Applicants respectfully submit that claim 31 is patentably distinct from Bertrand. Accordingly, Applicants respectfully request that the rejection of claim 31 be withdrawn.

Claim 32 has been amended in a similar manner as claims 7, 23 and 29. As such, Applicants submit that claim 32 is patentably distinct from Bertrand. Accordingly, Applicants respectfully request that the rejection of claim 32 be withdrawn.

Claim 33 has been amended in a similar manner as claims 16, 26 and 30. As such, Applicants submit that claim 33 is patentably distinct from Bertrand. Accordingly, Applicants respectfully request that the rejection of claim 33 be withdrawn.

REQUEST FOR ALLOWANCE

In view of the foregoing, Applicants submit that all pending claims in the application are patentable. Accordingly, reconsideration and allowance of this application are earnestly solicited. Should any issues remain unresolved, the Examiner is encouraged to telephone the undersigned at the number provided below.

Respectfully submitted,

Dated: April 25, 2007

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